

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official
capacity as Mayor of Atlantic City, New
Jersey, and individually,

LA'QUETTA SMALL-FRAZIER, in her
official capacity as Former Principal of
Pennsylvania Avenue School, and
individually,

BARRY CALDWELL, in his official
capacity as current Superintendent of the
Atlantic City School District,

PAUL A. SPAVENTA, in his official
capacity as former Interim Superintendent of
the Atlantic City School District,

ATLANTIC CITY BOARD OF
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No.: 1:21-cv-11189

**NOTICE OF MOTION
FOR *PRO HAC VICE*
ADMISSION OF
ANDRES JALON, ESQ.**

TO:

Marty Small, Sr.
City of Atlantic City, New Jersey
Office of the Mayor
1301 Bacharach Boulevard
Atlantic City, New Jersey 08401
Defendant

Barry Caldwell
Office of the Superintendent
1300 Atlantic Avenue
Atlantic City, NJ 08401
Defendant

La'Quetta Small
116 N. Presbyterian Avenue
Atlantic City, New Jersey 08401
Defendant

Paul A. Spaventa
22415 Arbor Circle
Milton, DE 19968
Defendant

Atlantic City Board of Education
1300 Atlantic Avenue
Atlantic City, NJ 08401
Defendant

Kayan Ahmed Frazier
Inmate Registration No.: 72688-050
Federal Detention Center – Philadelphia
700 Arch Street
Philadelphia, Pennsylvania 19106
Defendant

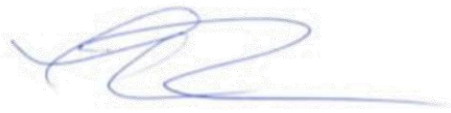
PLEASE TAKE NOTICE that the undersigned will apply to the above-named Court at the Mitchell H. Cohen Building & U.S. Courthouse located at 4th & Cooper Streets, Camden, New Jersey 08101 on Monday, April 18, 2022 at 9:00a.m. or as soon thereafter as may be heard, for an Order Allowing for the Admission *Pro Hac Vice* of Andres Jalon, Esquire, pursuant to Fed. R. Civ. P. 78, and L. Civ. R. 101.1(c)(1).

PLEASE TAKE FURTHER NOTICE that in support of this application, Plaintiff's Counsel shall rely upon the Certification of Terrell A. Ratliff, Esquire, and the Certification of Andres Jalon, Esquire, as attached.

Pursuant to Fed. R. Civ. P. 78, the undersigned requests that this matter be submitted to the Court for ruling on the papers unless opposition is filed, in which case, oral argument is specifically requested. A proposed form of Order is annexed hereto.

Dated: March 22, 2022

LENTO LAW GROUP, P.C.

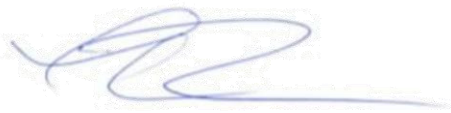


TERRELL A. RATLIFF, ESQUIRE

I certify that the within Notice of Motion and all supporting documents have been filed and served in the manner and within the time limits prescribed by the Rules.

Dated: March 22, 2022

LENTO LAW GROUP, P.C.



TERRELL A. RATLIFF, ESQUIRE